

**UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS**

EK VENTURES I, LLC; DAVID L. TAYLOR;  
DAVID L. TAYLOR AND VIRGINIA L.  
TAYLOR as TRUSTEES FOR THE TAYLOR  
FAMILY REVOCABLE TRUST; and  
FLEXTRONICS INTERNATIONAL LTD.,

Plaintiffs,

v.

JAMES R. BARTLETT and Z.B.R.  
PUBLICATIONS, INC.,

Defendants.

*and*

JAMES R. BARTLETT,

Third Party Plaintiff

v.

GLOBALWARE SOLUTIONS, INC.,  
ANTHONY RUDSTON and BRADLEY A. JAY,

Third Party Defendants.

CIVIL ACTION

No. 03 CV 12506 NMG

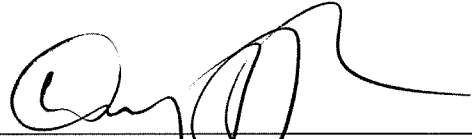
**PLAINTIFFS' RESPONSE TO DEFENDANT BARTLETT'S MOTION TO COMPEL  
DOCUMENTS RESPONSIVE TO HIS SECOND REQUEST**

Plaintiffs have not refused to produce non-privileged documents responsive to Bartlett's Second Request for Production of Documents. Rather, at the time the discovery conference was held, Plaintiffs' counsel was simply unable to commit to a date certain by which the documents would be available from all of his clients. Plaintiffs are now able to state that they will have the

documents available for inspection and copying by February 25, 2005. Bartlett's motion would therefore appear to be moot, and should be denied for that reason.

Dated this 25<sup>th</sup> day of January, 2005.

Respectfully submitted on behalf of the  
Plaintiffs, EK Ventures I, LLC; David L.  
Taylor; David L. Taylor and Virginia L.  
Taylor as Trustees for the Taylor Family  
Revocable Trust; and Flextronics  
International Ltd.



Jerold T. Everard, WSBA # 17142

Douglas R. Roach, WSBA # 21127

*Admitted Pro Hac Vice*

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& EVERARD

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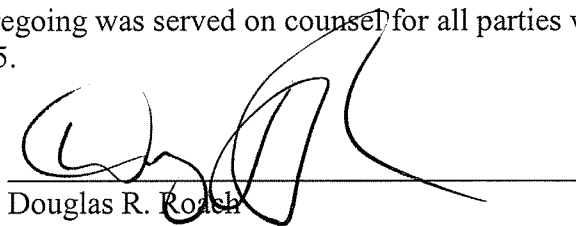
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on counsel for all parties via first-class mail/electronically on January 25, 2005.



Douglas R. Roach